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November 16, 2007

Via ECFS

Ms. Marlene R. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Triangle Communication System, Inc.
Petition for Redefinition**

CC Docket No. 96-45

Dear Ms. Dortch:

Pursuant to Federal Communications Commission (“FCC” or “Commission”) staff request, Triangle Communication System, Inc. (“TCS”), by its attorneys, hereby supplements its Redefinition Petition¹ with information on the population density of the wire centers within TCS’s proposed service area and the wire centers outside of TCS’s proposed service area but within the proposed redefined study areas of Central Montana Communications, Inc. (“CMC”) and Triangle Telephone Cooperative Association, Inc. (“TTCA”). TCS also clarifies certain issues raised in this proceeding.

¹ See Triangle Communication System, Inc. Petition for FCC Agreement to Redefine the Study Areas of Two Rural Telephone Companies in Montana, CC Docket No. 96-45 (filed August 16, 2007) (“Redefinition Petition”). See also *In the Matter of the Application of Triangle Communication System, Inc. Application for Designation as an Eligible Telecommunications Carrier*, Docket No. D2004.1.6, Petition of Triangle Communication System, Inc. for Designation as an Eligible Telecommunications Carrier (January 16, 2004) (“ETC Petition”). On November 23, 2005, TCS amended its *ETC Petition* to redefine the study areas of TTCA and CMC. On January 20, 2006, TCS again amended its *ETC Petition* to include an additional wire center in CMC’s study area. *In the Matter of the Application of Triangle Communication System, Inc. Application for Designation as an Eligible Telecommunications Carrier*, Docket No. D2004.1.6, Amended Petition of Triangle Communication System, Inc. for Designation as an Eligible Telecommunications Carrier (November 23, 2005) (“Amended Petition”); *In the Matter of the Application of Triangle Communication System, Inc. Application for Designation as an Eligible Telecommunications Carrier*, Docket No. D2004.1.6, Further Amended Petition of Triangle Communication System, Inc. for Designation as an Eligible Telecommunications Carrier (January 20, 2006) (“Further Amended Petition”) (the January 16, 2004 *ETC Petition*, November 23, 2005 *Amended Petition* and January 20, 2006 *Further Amended Petition* are referred to collectively herein as “*ETC Petition*”); *Letter to Marlene R. Dortch, Secretary, Federal Communications Commission, from Triangle Communication System, Inc.*, CC Docket No. 96-45, Supplement to Redefinition Petition (September 28, 2007) (“Supplement”).

As requested, the attached Exhibit A shows the population density of the wire centers in CMC and TTCA's study areas that TCS seeks to redefine and the population density of the wire centers which are in CMC and TTCA's study areas but outside TCS's proposed service area. In its Redefinition Petition and in its Supplement, TCS demonstrated that, contrary to MTA's arguments, TCS is not seeking to serve only the low-cost, high density wire centers of CMC and TTCA's study areas and therefore is not cream skimming. The population density data provided as Exhibit A again demonstrates that TCS will not primarily serve customers in low-cost, high density portions of the study areas of CMC and TTCA. Moreover, TCS notes that, since the 2000 Census, the population in all of the wire centers in TCS's proposed ETC service area in the area served by CMC has dramatically decreased.²

In its reply comments, the Montana Telephone Association ("MTA") again argued that TCS's Petition is premature because of a pending Montana district court proceeding. As TCS stated in its Reply Comments, TCS waited until MTA exhausted its administrative remedies and the Montana Public Service Commission ("MPSC") issued its Final Order on Reconsideration to file its Petition for Redefinition with the FCC.³ As TCS demonstrated in its Reply Comments, it is not premature for the FCC to act on the pending petition.⁴ Further, the FCC's concurrence with the MPSC's Orders will not interfere with or impact the pending state court proceeding.

MTA, in its reply comments, stated that TCS has other licenses that enable it to provide service to the complete study areas of TTCA and CMC, claiming that TCS is picking and choosing the highest-density, lowest cost exchanges. While it is true that TCS has other licenses, specifically 700 and 1900 MHz licenses, that cover TTCA and CMC's study areas, TCS is not picking and choosing the most lucrative exchanges. TCS has agreed to serve all of the incumbent local exchange carriers' ("ILEC") wire centers that fall within TCS's 800 MHz licensed area, including the areas within those exchanges that are presently unserved by any other wireless carrier. It is not feasible for TCS to serve additional area utilizing its 700 MHz and 1900 MHz licenses. TCS's 700 MHz spectrum is currently used almost exclusively for mobile video and high speed Internet access, and there is no equipment available to offer the type of voice service currently offered by TCS over a 700 MHz network. TCS's 1900 MHz licenses cannot currently be deployed without jeopardizing TCS's compliance with its ETC obligations. As a condition of designating TCS as an ETC, the MPSC required TCS to serve in

² For example, from April 2000 to July 2006, the population of Phillips County (which includes the Malta wire center) and Blaine County (which includes the Harlem wire center) decreased by eleven percent and five percent, respectively. See Exhibit B: U.S. Census Bureau, Population Division: Table 1: Annual Estimates of the Population for Counties of Montana: April 1, 2000 to July 1, 2006 (CQ-EST20006-01-30) (March 2007).

³ The MPSC issued an Order on May 8, 2007 and, after MTA unsuccessfully sought reconsideration of the MPSC's Order, a Final Order on Reconsideration on July 26, 2007. See *in the Matter of the Application of Triangle Communication System, Inc. Application for Designation as a Eligible Telecommunications Carrier*, Docket No. D2004.1.6, Final Order Designating Eligible Telecommunications Carrier, Order No. 6723a (May 8, 2007) ("Order"); see also *in the Matter of the Application of Triangle Communication System, Inc. Application for Designation as an Eligible Telecommunications Carrier*, Docket No. D2004.1.6, Final Order, Order on Reconsideration, Order No. 6723b (July 26, 2007) ("Final Order on Reconsideration"); see also *in the Matter of the Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Triangle Communication System, Inc. Petition for FCC Agreement to Redefine the Study Areas of Two Rural Telephone Companies in Montana*, DA No. 07-3791, Reply Comments of Triangle Communication System, Inc. (October 15, 2007) ("Reply Comments").


⁴ The MPSC reaffirmed that TCS's ETC designation is in the public interest in its *ex parte* letter filed with the FCC on November 8, 2007. The MPSC also reasserted that TCS provided "sufficient data" for the MPSC to conclude that TCS's ETC designation is in the public interest. See *Letter to Marlene R. Dortch, Secretary, Federal Communications Commission, from the Montana Public Service Commission*, CC Docket No. 96-45, *Agreement to Redefine the Study Areas of Two Rural Telephone Companies* (November 8, 2007).

five years 98 percent of the population within its proposed service area at a signal strength of -104 dbm. Due to the propagation characteristics of the spectrum, TCS's 1900 MHz licenses do not provide the required signal strength to allow TCS to provide service in five years to 98 percent of the population. TCS cannot meet the MPSC's strict build-out condition if it uses its 1900 MHz licenses. Furthermore, TCS does not hold 1900 MHz licenses that cover the entire incumbent study areas at issue in this case. More specifically, TCS does not hold 1900 MHz licenses for the majority of the Broadview, Rapelje and Molt exchanges. The only way TCS can fulfill the MPSC's strict build-out requirement is through use of its 800 MHz licenses.

TCS's proposed universal service offering will provide numerous benefits to consumers. For example, universal service support will enable TCS to accelerate the deployment of its advanced wireless services to rural Montana citizens. TCS will also use support to offer a basic universal service package to subscribers who are eligible for Lifeline support, particularly those subscribers who reside on the Fort Belknap Reservation. Additionally, the mobility of TCS's wireless service will provide benefits such as access to emergency services that can mitigate the unique risks of geographic isolation living in remote, rural communities.⁵

If you have any questions regarding this matter, please communicate directly with the undersigned.

Sincerely,


Rebecca L. Murphy
Michael R. Bennet

cc: Jeremy Marcus
Jennifer McKee
Jennifer Prime
Rick Stevens
Gail Rainey
Bonnie Lorang

⁵ TCS currently provides Phase II E911 in Blaine County and basic 911 in Liberty and Phillips Counties in accordance with the FCC's rules. TCS will begin providing Phase II E911 in Liberty County in early 2008.

Triangle Communication System, Inc.

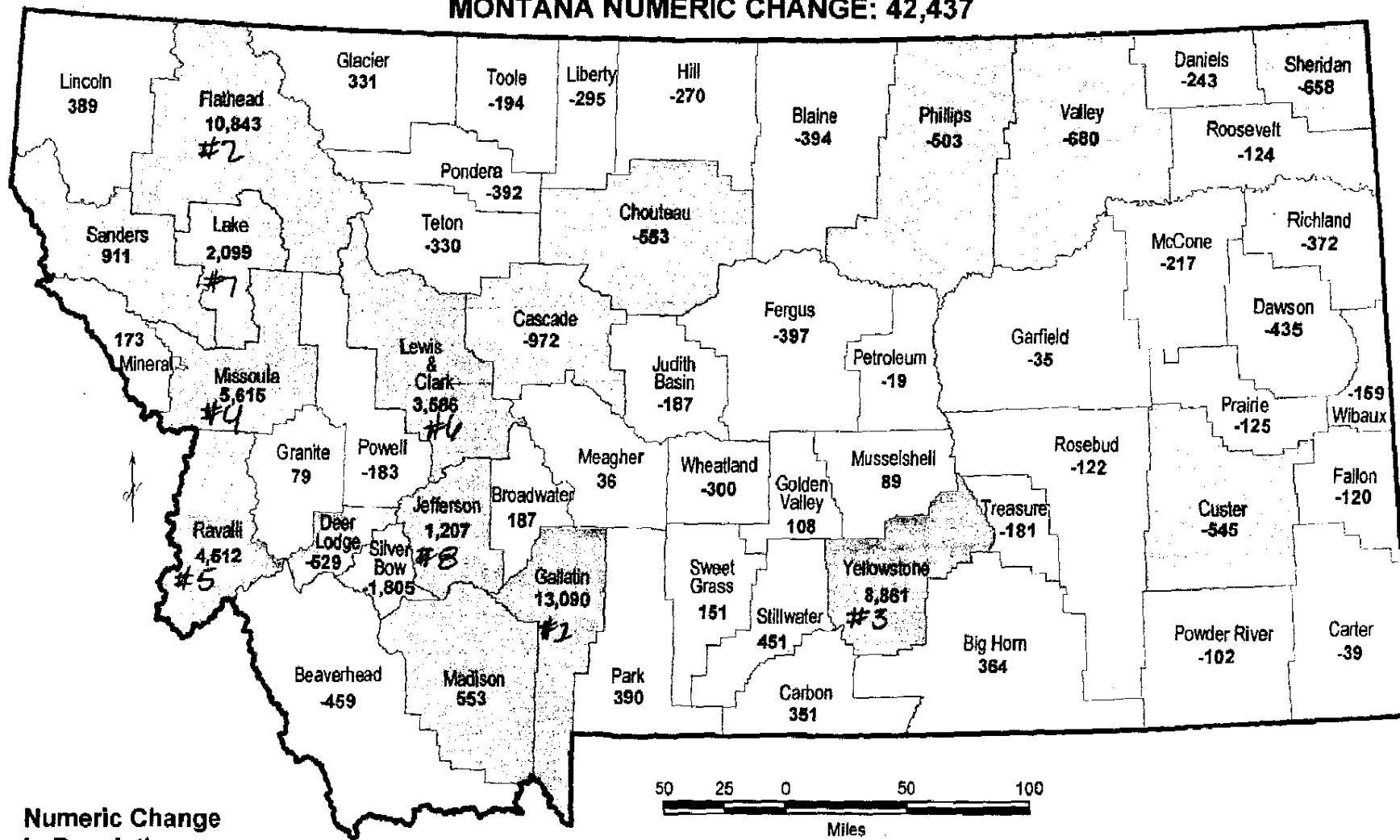
Exhibit A

Coverage	ILEC by Wire Center	Total ILEC Service Area			Proposed TCS ETC Service Area			Outside TCS ETC Service Area		
		Population	Square Miles	Density	Population	Square Miles	Density	Population	Square Miles	Density
CENTRAL MONTANA COMMUNICATIONS, INC.										
	DENTON	451	340.0	1.33				451	340.0	1.33
ENTIRE	DODSON	65	106.1	0.61	65	106.1	0.61			
	FORT BENTON	1797	250.5	7.17				1797	250.5	7.17
	GERALDINE	472	525.5	0.90				472	525.5	0.90
ENTIRE	HARLEM	1485	254.6	5.83	1485	254.6	5.83			
	HARLOWTON	1538	783.0	1.96				1538	783.0	1.96
	HOBSON	351	350.1	1.00				351	350.1	1.00
	JUDITH GAP	680	416.1	1.63				680	416.1	1.63
ENTIRE	MALTA	2471	296.2	8.34	2471	296.2	8.34			
	MARTINSDALE	323	686.0	0.47				323	686.0	0.47
	MOORE	786	385.1	2.04				786	385.1	2.04
	STANFORD	822	418.8	1.96				822	418.8	1.96
	WHITE SULPHUR SPRINGS	881	335.2	2.63				881	335.2	2.63
Total Population Coverage (2000 Census Blocks):		12,122			4,021			8,101		
Total Coverage Area (square mile):			5,147.21			656.94			4,490.28	
Total Density				2.36			6.12			1.80
TRIANGLE TELEPHONE COOPERATIVE ASSN., INC.										
	BIG SANDY	1629	530.0	3.07				1629	530.0	3.07
	BIG TIMBER	3415	1363.5	2.50				3415	1363.5	2.50
	BOXELDER	354	147.9	2.39				354	147.9	2.39
	BROADVIEW	1742	424.0	4.11				1742	424.0	4.11
ENTIRE	CHESTER	1116	237.9	4.69	1116	237.9	4.69			
ENTIRE	CHINOOK	2781	1786.4	1.56	2781	1786.4	1.56			
	GILDFORD	261	238.4	1.09				261	238.4	1.09
ENTIRE	HAYS	2216	1300.0	1.70	2216	1300.0	1.70			
	HINGHAM	175	170.7	1.03				175	170.7	1.03
	HOPP-ILLIAD	1569	1160.6	1.35				1569	1160.6	1.35
	JOPLIN	562	659.1	0.85				562	659.1	0.85
	KREMLIN	247	225.1	1.10				247	225.1	1.10
	LOMA	359	482.5	0.74				359	482.5	0.74
	MELVILLE	517	641.1	0.81				517	641.1	0.81
	MOLT	1134	251.9	4.50				1134	251.9	4.50
	NORTH HAVRE	270	396.0	0.68				270	396.0	0.68
	RAPELJE	462	406.4	1.14				462	406.4	1.14
	REEDPOINT	497	320.2	1.55				497	320.2	1.55
	RUDYARD	441	487.6	0.90				441	487.6	0.90
	SIMPSON	307	452.5	0.68				307	452.5	0.68
	SOUTH CHESTER	307	337.1	0.91				307	337.1	0.91
	SOUTH HAVRE	3666	561.9	6.52				3666	561.9	6.52
ENTIRE	SOUTH MALTA	567	2111.1	0.27	567	2111.1	0.27			
ENTIRE	SOUTH MALTA (N)	395	623.3	0.63	395	623.3	0.63			
ENTIRE	TURNER	536	1052.9	0.51	536	1052.9	0.51			
ENTIRE	WHITEWATER	620	973.56	0.64	620	973.56	0.64			
	WINIFRED	863	1,016.24	0.85				863	1,016.24	0.85
Total Population Coverage (2000 Census Blocks):		27,008			8,231			17,914		
Total Coverage Area (square mile):			18,357.78			8,085.18			10,272.60	
Total Density				1.47			1.02			1.74

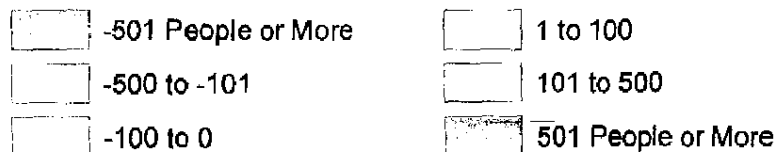
MONTANA COUNTY POPULATION

Total Numeric Change Between 2000 Census and 2006 Estimates

MONTANA NUMERIC CHANGE: 42,437



Numeric Change
in Population



Map by:
Census & Economic Information Center
Montana Department of Commerce
301 S. Park Ave, Helena, MT 59620-0505
406-841-2740 ceic@mt.gov
<http://ceic.mt.gov>

March 2007 - county_pop_numchg06.mxd

Source: Population Division, U.S. Census Bureau, Table 1: Annual Estimates of the Population for Counties of Montana: April 1, 2000 to July 1, 2006 (CO-EST2006-01-30), Release Date: Mar 20, 2007.